

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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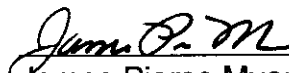
Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.
TO UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
(MPA/USPS-T39-2-7)
(November 13, 2001)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Magazine Publishers of America, Inc. (MPA) directs the following interrogatories to United States Postal Service witness Kingsley (USPS-T-39).

Respectfully submitted,


James Pierce Myers

Counsel for
MAGAZINE PUBLISHERS OF AMERICA, INC.

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MPA/USPS-T39-2. Please complete Table 1 by providing the typical numbers of crossdocks that would be required for a 3-digit container that is entered at the specified facilities. For example, if the typical mail flow for a 3-digit container that is entered at an Origin Area Distribution Center (OADC) is to be crossdocked at that facility, at the Origin Bulk Mail Center (OBMC), at the Destination Bulk Mail Center (DBMC), and then again at the Destination Area Destination Center (DADC) before finally being broken down at the Destination Sectional Center facility (DSCF), enter a 2 in the “Number of Bulk Mail Centers” column, a 2 in the “Number of Area Distribution Centers” column, and a 0 in the “Number of Sectional Center Facilities (SCFs)” column in the “OADC Not In Service Territory of DBMC” row.

Table 1. Typical Number of Crossdocks Required for a 3-Digit Container

Entry Facility	Number of Bulk Mail Centers (BMCs)	Number of Area Distribution Centers (ADCs)	Number of Sectional Center Facilities (SCFs)
Origin Associate Office (OAO) in Service Territory of Destination SCF (DSCF)			
DSCF			
OAO in Service Territory of Destination ADC (DADC)			
Origin SCF (OSCF) in Service Territory of DADC			
DADC			
OAO in Service Territory of Destination BMC (DBMC)			
OSCF in Service Territory of DBMC			
OADC in Service Territory of DBMC			
DBMC			
Origin BMC (OBMC)			
OADC Not In Service Territory of DBMC			
OSCF Not In Service Territory of DBMC or DADC			
OAO Not In Service Territory of DBMC or DADC			

MPA/USPS-T39-3. Assume that a 3-digit sack of periodicals is entered at an Origin Sectional Center Facility (OSCF) within the Destination Area Distribution Center (DADC) service territory.

(a) What is the probability that this 3-digit sack will be transported directly to the destination Sectional Center Facility (SCF) from the OSCF? Please explain your response fully.

(b) What is the probability that this 3-digit sack will be transported directly to the Destination Delivery Unit (DDU) from the OSCF? Please explain your response fully.

(c) What is the probability that this 3-digit sack will be transported directly to the DADC from the OSCF? Please explain your response fully.

MPA/USPS-T39-4. Assume that a 3-digit pallet containing periodicals is entered at an Origin Sectional Center Facility (OSCF) within the Destination Area Distribution Center (DADC) service territory.

(a) What is the probability that this 3-digit pallet will be transported directly to the Destination Sectional Center Facility (DSCF) from the OSCF? Please explain your response fully.

(b) What is the probability that this 3-digit pallet will be transported directly to the Destination Delivery Unit (DDU) from the OSCF? Please explain your response fully.

(c) What is the probability that this 3-digit pallet will be transported directly to the DADC from the OSCF? Please explain your response fully.


MPA/USPS-T39-5. Assume that a 3-digit sack of periodicals is entered at a Destination Area Distribution Center (DADC). What is the probability that this 3-digit sack will be transported directly to the Destination Delivery Unit (DDU) from the DADC? Please explain your response fully.

MPA/USPS-T39-6. Assume that a 3-digit pallet containing periodicals is entered at a Destination Area Distribution Center (DADC). What is the probability that this 3-digit pallet will be transported directly to the Destination Delivery Unit (DDU) from the DADC? Please explain your response fully.

MPA/USPS-T39-7. Please confirm that periodicals mail that is entered at the Destination Delivery Unit, Destination Sectional Center Facility, and Destination Area Distribution Center does not incur plant load costs. If not confirmed, please explain fully.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

A handwritten signature in black ink, appearing to read "James P. Myers", is written over a horizontal line.

James Pierce Myers
Counsel for
MAGAZINE PUBLISHERS OF AMERICA, INC.

November 13, 2001
Alexandria, VA